

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JANE DOE,	:	CASE NO.: 2:20-cv-00459
	:	
Plaintiff,	:	JUDGE GRAHAM
	:	
vs.	:	MAGISTRATE JUDGE LITKOVITZ
	:	
ANDREW K. MITCHELL, <i>et al.</i> ,	:	
	:	
Defendants.	:	

**PLAINTIFF'S SUPPLEMENTAL DISCLOSURES PURSUANT TO FEDERAL RULE
OF CIVIL PROCEDURE 26(a)(1)**

Now comes Plaintiff, and hereby gives notice that David A. Goldstein, Esq., of David A. Goldstein Co., L.P.A. and Sara M. Valentine, Esq., of David A. Goldstein Co., L.P.A., and pursuant to Federal Rule of Civil Procedure 26(a)(1) and the Case Management Conference Order, Plaintiff makes the following supplemental disclosures.

These disclosures are based on information presently known and reasonably available to Plaintiff and which Plaintiff reasonably believes she may use in support of her defenses. Continuing investigation and discovery may cause Plaintiff to amend these supplemental disclosures, including by identifying other potential witnesses, documents, and by disclosing other pertinent information. Plaintiff therefore reserves the right to supplement these supplemental disclosures.

By providing these supplemental disclosures, Plaintiff does not represent that she is identifying every document, tangible thing, or witness possibly relevant to this action.

In addition, these disclosures are made without Plaintiff in any way waiving her right to object to any discovery request or proceeding involving or relating to the subject matter of these disclosures on any grounds, including competency, privilege, relevancy and materiality, hearsay,

undue burden, confidentiality, or any other appropriate grounds. Furthermore, these disclosures are not an admission by Plaintiff regarding any matter. Each and every disclosure set forth below is subject to the above qualifications and limitations.

1. Individuals Likely to Have Discoverable Information

Individuals likely to have discoverable factual information that Plaintiff may use to support her defenses in the above-referenced lawsuits are as follows:

1. Hannah Estabrook, MA, LPCC-S. Will address the allegations in the Complaint, investigation, and other relevant matters. This is not an exhaustive list of her testimony;
2. Any and all investigating officers from the FBI and any and all other agencies. Will supplement;
3. Any and all other victims of Defendant Mitchell as identified in the criminal indictment. Said identities will be disclosed once those names are unsealed.

Plaintiff reserves the right to supplement.

2. Description of Documents

The following enumerates documents, data compilations, and other tangible things in the possession, control, or custody of Plaintiff that Plaintiff may use to support her allegations:

1. The Standard Operating Procedure Manual for the Vice Section of the Columbus Police Department.

Plaintiff reserves the right to supplement as discovery is ongoing.

Respectfully submitted,

/s/ David A. Goldstein

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/s/ Sara M. Valentine

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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document has been sent via Electronic Mail this 24th day of February 2022 to **Scott C. Walker, Esq.**, Attorney for Defendant Andrew K. Mitchell, at Walker Novack Legal Group, LLC, 5013 Pine Creek Drive, Westerville, Ohio 43081, tom@walkernovack.com, **Thomas J. Novack, Esq.**, Attorney for Defendant Andrew K. Mitchell, at Walker Novack Legal Group, LLC, 5013 Pine Creek Drive, Westerville, Ohio 43081, scott@walkernovack.com, **Janet R. Hill Arbogast, Esq.**, Attorney for Defendant City of Columbus, at City of Columbus, Department of Law, 77 North Front Street, 4th Floor, Columbus, Ohio 43215, jrhillarbogast@columbus.gov, **Joseph M. Gibson, Esq.**, Attorney for Defendant City of Columbus, at City of Columbus, Department of Law, 77 North Front Street, 4th Floor, Columbus, Ohio 43215, jmgibson@columbus.gov, and **Richard N. Coglianese, Esq.**, Attorney for Defendant City of Columbus, at City of Columbus, Department of Law, 77 North Front Street, 4th Floor, Columbus, Ohio 43215, rncoglianese@columbus.gov.

/s/ Sara M. Valentine
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